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**VIA ECF**

Hon. Lorna G. Schofield  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

March 15, 2017

United States v. Carlos ZAVALA VELASQUEZ, et al.  
15 Cr. 174 (LGS)

Dear Judge Schofield:

As the Court will recall, I am the attorney of record representing Mr. Zavala Velasquez in this matter.

In light of the Court's latest scheduling Order of March 9, 2017 adjourning the status conference of March 16, 2017 until March 23, and further directing the parties to submit a joint letter addressing outstanding discovery issues by March 20, 2017, I now write on behalf of all defense counsel for the purpose of requesting that the issue of scheduling non-discovery motions be taken up at the March 23 conference. These motions are otherwise currently due tomorrow, March 16, 2016.

The government consents to this request.

As the Court will also recall, and as has previously been stated, the government has sought an extensive amount of material in its MLAT letter, which is addressed in our discovery motions pending before the Court. The government still expects to start receiving responses in the next few weeks and that it will make at least some of this material available to defense counsel. As noted earlier, this material, which represents outstanding discovery, will inform our motion practice.

Accordingly, we ask that the parties be permitted to take up the issue of scheduling non-discovery motions, as well as outstanding discovery, at the

conference before the Court on March 23, 2017.

Respectfully submitted,



HOWARD LEADER

cc: Emil Bove, Esq.

Matthew Laroche, Esq.

Assistants United States Attorney

(VIA EMAIL AND ECF)

All defense counsel of record

(VIA EMAIL AND ECF)